

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
 Inc.'s Petition for Waiver for the)
 Miami Palmetto Central Office)
) Filed: July 27, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Waiver in accordance with the 1996 Telecommunications Act (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests a exemption from the physical collocation requirements set forth in the Act and in the Order for the Miami Palmetto Central Office ("CO") located at 9056 N.W. 41st Street, Miami Florida 33166. BellSouth seeks this exemption on the grounds that it is unable to meet physical collocation requests² due to space limitations in the CO. BellSouth does not expect to construct an addition to the building in the foreseeable future.³

1. The Miami Palmetto CO houses a No. 5 ESS switch. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks, subscriber carrier terminals, and digital

¹ 1996 Telecommunications Act, Section 251(c)(6); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released August 8, 1996, Paragraphs 602-607.

² 770 square feet is currently being utilized for providing physical collocation.

³ Pursuant to the FCC directive, BellSouth will consider collocation requirements in any future construction undertaken.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

cross connect panels. The circuit equipment provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Miami Palmetto CO is growing at the rate of over 5,000 lines per year and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 76,000 in 1998. To meet the demands of the expanding customer base, BellSouth currently has on order an addition to the local switch, as well as additional power equipment to abate the ampere drain (currently peaking at 4,656 amperes, on the plant which has been growing at 7% per year), and the addition of transmission equipment, video, fiber rings and miscellaneous circuits.

3. Under the Act, Incumbent Local Exchange Companies ("ILECs") have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

Act, 251(c)(6)

Thus, an ILEC is required to provide physical collocation unless it is "not practical...because of space limitations." Id. The term "space limitations" encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to "retain a limited amount of floor space for defined future uses" (Order, Par. 804). Without the latter

element, competitive entrants "could prevent incumbent LECs from serving their customers effectively." Id.

4. Due to space limitations in the Miami Palmetto CO, BellSouth is unable to provide physical collocation. The space limitations with which BellSouth is faced are the result of both the amount of existing BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers. BellSouth is submitting in conjunction with this Petition a floor plan evidencing both the current equipment and the areas set aside for defined future uses. (Exhibit 1).

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and
6. BellSouth determined available collocation space by subtracting Items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for physical collocation. The facility currently has 24,398 square feet. A total of 19,971.5 square feet is occupied as follows:

<u>Square Feet</u>	<u>Description</u>
351	Air Conditioning Room
1,550	Restrooms and Storage
1,878	Administrative
4,957.5	Toll/Transmission Equipment
4,357	Switch
2,613	Power and Engine Rooms
3,465	Frame
800	Collocation Arrangements

A total of 133 square feet is considered unusable space which contains an air passage for air return to an Air Handling Unit and the space is too narrow for equipment.

7. The remaining 4,293.5 square feet in the facility is reserved for defined future use essential for BellSouth to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing switching system, power and transmission equipment as well as space for virtual collocation. These projects will use the remaining space in the facility. As previously stated, BellSouth has provided the Commission with a detailed floor plan indicating the space


constraints under which BellSouth is currently operating at the Miami Palmetto CO as well as the areas designated for defined future use. (Exhibit 1).


8. The Miami Palmetto CO contains no available space for additional physical collocation and for this reason the Palmetto CO should be excluded from physical collocation requirements. BellSouth will, of course, offer virtual collocation in the Miami Palmetto CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Miami Palmetto CO.

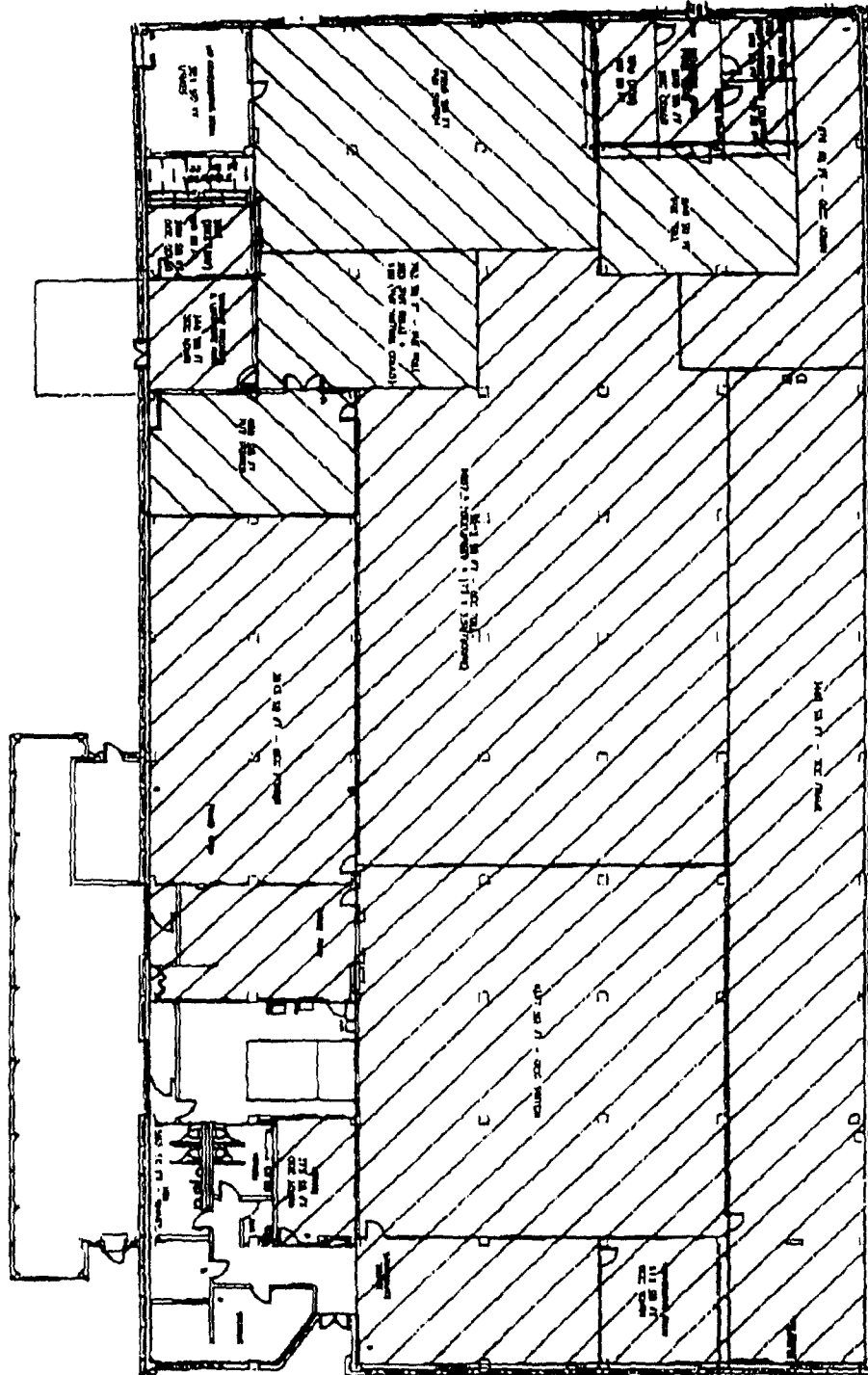
Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.


ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5555


WILLIAM J. ELLENBERG II
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0711

M6121 MIAMI PALMETTO FIRST FLOOR PLAN



Legend

Symbol	Description
[Hatched Box]	Concrete Slab
[Diagonal Line Box]	Concrete Wall
[Solid Box]	Other

Notes:

1. ALL DIMENSIONS ARE IN FEET AND INCHES.
2. ALL WALLS ARE 12" THICK UNLESS NOTED OTHERWISE.
3. ALL FLOORS ARE 4" THICK CONCRETE SLAB ON GRADE.
4. ALL ROOFS ARE 6" THICK CONCRETE SLAB ON GRADE.
5. ALL CEILING ARE 8' HIGH UNLESS NOTED OTHERWISE.
6. ALL DOORS ARE 3' WIDE UNLESS NOTED OTHERWISE.
7. ALL WINDOWS ARE 6' WIDE UNLESS NOTED OTHERWISE.
8. ALL STAIRS ARE 36" WIDE UNLESS NOTED OTHERWISE.
9. ALL ELEVATORS ARE 36" WIDE UNLESS NOTED OTHERWISE.
10. ALL SERVICE AREAS ARE 12' WIDE UNLESS NOTED OTHERWISE.

REC'D - FPSC

Legal Department

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
160 South Monroe Street
Room 400
Tallahassee, Florida 32301
(905) 347-6558

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RECORDS AND
REPORTING

July 27, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980946-TL
Temp. Waiver Daytona Beach/Port Orange Central Office

DYBH FLPO DSO

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for Temporary Waiver, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White

Nancy B. White (Bul)

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenber II

DOCUMENT NUMBER-DATE

07911 JUL 27 98

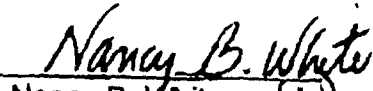

FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
TEMPORARY WAIVER FOR DAYTONA BEACH/PORT ORANGE CENTRAL OFFICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 27th day of July, 1998 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30375


Nancy B. White 

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
Inc.'s Petition for Temporary Waiver)
for Daytona Beach Port Orange)
Central Office)
_____) Filed: July 27, 1998

**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR TEMPORARY WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Temporary Waiver in accordance with the 1996 Telecommunications Act (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests a temporary exemption from the physical collocation requirements set forth in the Act and in the Order for the Daytona Beach Port Orange Central Office ("CO") located at 829 Orange Avenue, Daytona Beach, FL 32119. BellSouth seeks this temporary exemption on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth seeks only a temporary waiver because BellSouth is enlarging the building to ease space constraints and provide additional space for physical collocation.

1. The Daytona Beach Port Orange CO building houses a DMS 100/200 switch and a Nortel Local Signal Transfer Point (LSTP) switch. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems,

¹ 1996 Telecommunications Act, Section 251(c)(6); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-98, Released August 8, 1996, Paragraphs 602-607.

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FPSC-RECORDS/REPORTING

multiplexers, digital channel banks, subscriber carrier terminals, and digital cross connect panels. The circuit equipment provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Daytona Beach Port Orange CO is growing rapidly and the facility is under enormous space constraints. To meet the demands of the expanding customer base, BellSouth currently has orders placed for additional DMS 100 switching equipment, as well as fiber optic terminals, subscriber loop carrier, DSX-1 and DSX-3 cross connect bays, and D4 channel banks. Moreover, BellSouth is planning a building addition to the facility which is expected to complete some time during the year 2000. The addition, which is in the preliminary planning stages, will add sufficient square footage to the facility to accommodate additional physical collocation.²

3. Under the Act, Incumbent Local Exchange Companies ("ILECs") have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

Act, 251(c)(8)

Thus, an ILEC is required to provide physical collocation unless it is "not practical...because of space limitations." Id. The term "space limitations" encompasses

² Pursuant to the FCC directive, BellSouth has considered, and will continue to consider, collocation requirements in any future construction undertaken.

two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to "retain a limited amount of floor space for defined future uses" (Order, Par. 604). Without the latter element, competitive entrants "could prevent incumbent LECs from serving their customers effectively." Id.

4. Due to space limitations in the Daytona Beach Port Orange CO, BellSouth is unable to provide physical collocation. The space limitations with which BellSouth is faced are the result of both the amount of existing BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers. BellSouth is submitting in conjunction with this Petition a floor plan evidencing both the current equipment and the areas set aside for defined future uses. (Exhibit 1).

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and

6. BellSouth determined available collocation space by subtracting -- items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for physical collocation. The facility currently has 13,455 square feet. A total of 11,132 square feet is occupied as follows:

<u>Square Feet</u>	<u>Description</u>
360	Cable Vault
1,428	Mechanical Room, Plenum, Restrooms, Receiving Room, Electrical Closet, and Janitor Room
1,138	House Service Panel, Mechanical Room, and Plenum
476	Administrative
1,743	Toll/Transmission Equipment
2,701	Switch
1,270	Power and Engine Rooms
2,020	Frame

7. Of the remaining 2,313 square feet in the facility is reserved for defined future use essential for BellSouth to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing switching system, power and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth has provided the Commission with a detailed floor plan indicating the space constraints under which BellSouth is currently operating at the Daytona Beach Port Orange CO, as well as the areas designated for defined future use. (Exhibit 1).

8. The Daytona Beach Port Orange CO presently contains no available space for physical collocation and for this reason should be temporarily excluded from the collocation requirements. The waiver should remain in effect until completion of the addition to the Daytona Beach Port Orange facility which is currently expected to complete in the year 2000. BellSouth will, of course, offer virtual collocation in the Daytona Beach Port Orange CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Temporary Waiver and temporarily exempt BellSouth from the obligation to offer physical collocation in the Daytona Beach Port Orange CO.

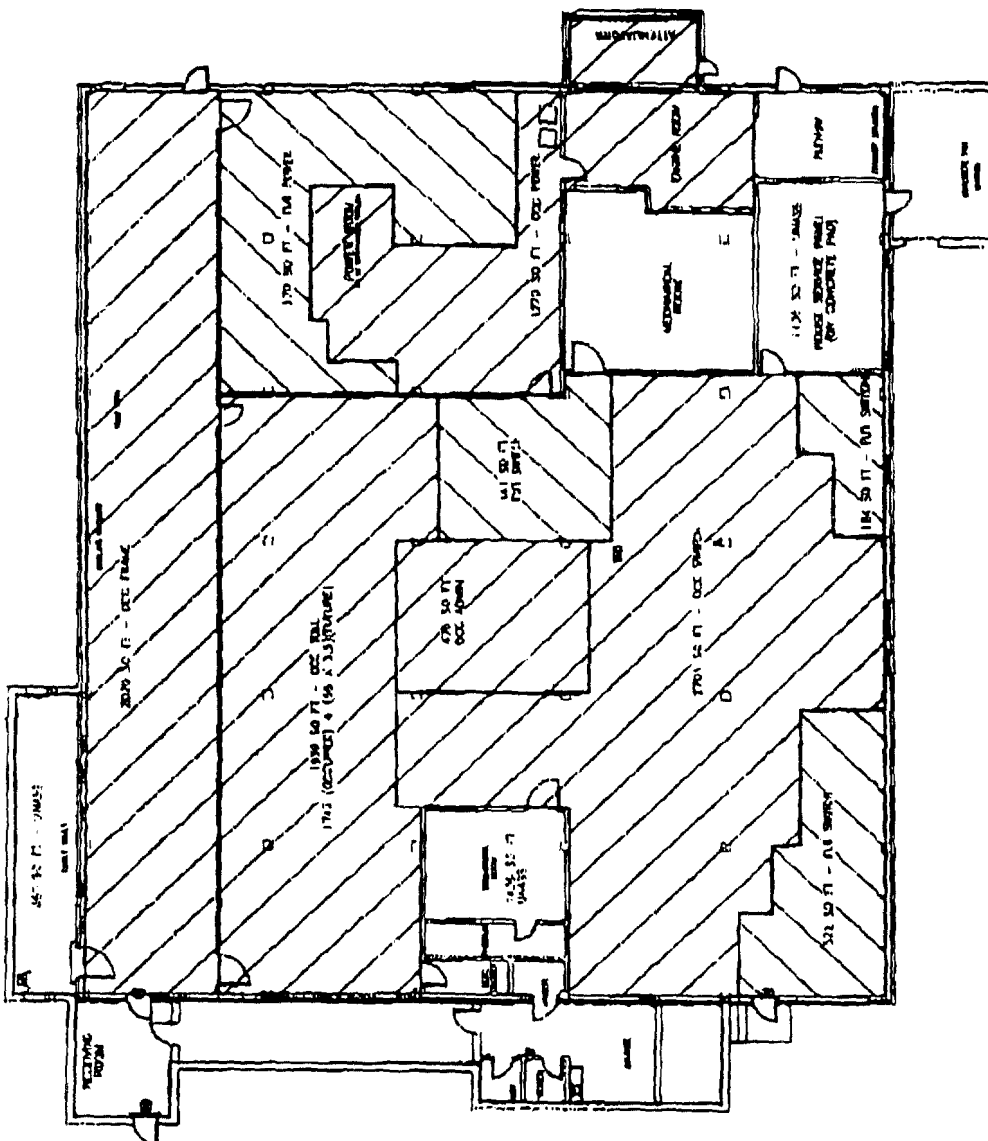
Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.

Robert G. Beatty (for)
ROBERT G. BEATTY
NANCY B. WHITE
c/o Nancy Sims
150 South Monroe Street, #400
Tallahassee, Florida 32301
(305) 347-5555

William J. Ellenberger (for)
WILLIAM J. ELLENBERG II
675 West Peachtree Street, #4300
Atlanta, Georgia 30375
(404) 335-0711

1



33850 DAYTONA BEACH - PORT ORANGE FIRST FLOOR PLAN

NOTES & DETAILS

1. ALL WORK TO BE DONE IN ACCORDANCE WITH THE LATEST EDITIONS OF THE BUILDING CODES AND SPECIFICATIONS.
2. ALL MATERIALS TO BE USED SHALL BE OF THE BEST QUALITY AND SHALL BE APPROVED BY THE ARCHITECT.
3. ALL WORK SHALL BE DONE IN ACCORDANCE WITH THE LATEST EDITIONS OF THE BUILDING CODES AND SPECIFICATIONS.
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Legal Department

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RECORDS AND
REPORTING

NANCY B. WHITE
Assistant General Counsel-Florida

BellSouth Telecommunications, Inc.
150 South Monroe Street
Room 400
Tallahassee, Florida 32301
(306) 347-8858

July 27, 1998

Mrs. Blanca S. Bayó
Director, Division of Records and Reporting
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Re: Docket No. 980947-TL

Waiver for Boca Raton/Boca Teasca Central Office BCRT FLBT DSD

Dear Ms. Bayó:

Enclosed is an original and fifteen copies of BellSouth Telecommunication's Inc.'s Petition for Waiver, which we ask that you file in the captioned matter.

A copy of this letter is enclosed. Please mark it to indicate that the original was filed and return the copy to me. Copies have been served to the parties shown on the attached Certificate of Service.

Sincerely,

Nancy B. White
(Pw)

Nancy B. White

Enclosures

cc: All parties of record
A. M. Lombardo
R. G. Beatty
William J. Ellenberg II

DOCUMENT NUMBER-DATE

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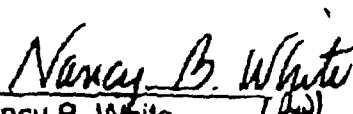
FPSC-RECORDS/REPORTING

**CERTIFICATE OF SERVICE
WAIVER FOR BOCA RATON/BOCA TEECA CENTRAL OFFICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via
U.S. Mail this 27th day of July, 1998 to the following:

Staff Counsel
Florida Public Service
Commission
Division of Legal Services
2540 Shumard Oak Boulevard
Tallahassee, FL 32308-0850

Amanda Grant
BellSouth Telecommunications, Inc.
Regulatory & External Affairs
675 West Peachtree Street, N.E.
Room 38L64
Atlanta, Georgia 30376


Nancy B. White (for)

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: BellSouth Telecommunications,) Docket No.:
 Inc.'s Petition for Waiver for the)
 Boca Raton Boca Teeca Central)
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**BELLSOUTH TELECOMMUNICATIONS, INC.'S
PETITION FOR WAIVER**

BellSouth Telecommunications, Inc. ("BellSouth"), pursuant to Rule 25-22.036, Florida Administrative Code, files this Petition for Waiver in accordance with the Telecommunications Act of 1996 (the "Act") and the Federal Communications Commission's ("FCC") First Report and Order (the "Order").¹ Pursuant to this authority, BellSouth requests an exemption from the physical collocation requirements set forth in the Act and in the Order for the Boca Raton Boca Teeca Central Office ("CO") located at 5140 Congress Avenue, Boca Raton, FL 33487. BellSouth seeks this exemption on the grounds that it is unable to meet physical collocation requests due to space limitations in the CO. BellSouth does not expect to construct an addition to the building in the foreseeable future.²

1. The Boca Raton Boca Teeca CO building houses DMS-100, E911, and Rockwell Collins ACD equipment. The circuit equipment located in the CO consists of fiber optic terminals, digital cross-connect systems, multiplexers, digital channel banks,

¹ 1996 Telecommunications Act, Section 251(c)(5); FCC's First Report and Order, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, CC Docket No. 96-90, Released August 8, 1996, Paragraphs 602-607.

² Pursuant to the FCC directive, BellSouth will consider collocation requirements in any future construction undertaken.

DOCUMENT NUMBER-DATE

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FPSC-RECORDS/REPORTING

subscriber carrier terminals, and digital cross connect panels. The circuit equipment provides connectivity to other COs and local customers. Rectifiers and battery strings provide power to the above equipment.

2. The area served by the Boca Raton Boca Teeca CO is growing rapidly and thus the facility is under enormous space constraints. The lines in service in this CO will exceed 39,324 in 1998. To meet the demands of the expanding customer base, BellSouth currently has on order an addition to the local switch, as well as additional transmission equipment, such as fiber optic terminals, sonet multiplexers, including 8 DMS-100 cabinets, and a future E911 Rockwell Collins ACD.

3. Under the Act, Incumbent Local Exchange Companies ("ILECs") have the following obligation:

The duty to provide, on rates, terms, and conditions that are just, reasonable, and nondiscriminatory, for physical collocation of equipment necessary for interconnection or access to unbundled network elements at the premises of the local exchange carrier, except that the carrier may provide for virtual collocation if the local exchange carrier demonstrates to the State Commission that physical collocation is not practical for technical reasons or because of space limitations.

Act, 251(c)(6)

Thus, an ILEC is required to provide physical collocation unless it is "not practical...because of space limitations." Id. The term "space limitations" encompasses two factors: first, ILECs are entitled to consider space already in use by the ILEC at the time the collocation request is made; second, ILECs are entitled to "retain a limited amount of floor space for defined future uses" (Order, Par. 604). Without the latter

element, competitive entrants "could prevent incumbent LECs from serving their customers effectively." Id.

4. Due to space limitations in the Boca Raton Boca Teeca CO, BellSouth is unable to provide physical collocation. The space limitations with which BellSouth is faced are the result of both the amount of existing BellSouth equipment, and the planned installation of additional equipment essential to the effective service of BellSouth customers. BellSouth is submitting in conjunction with this Petition a floor plan evidencing both the current equipment and the areas set aside for defined future uses. (Exhibit 1).

5. In an effort to identify space currently available for physical collocation, BellSouth employed the following procedure:

1. BellSouth determined in the total square footage within the facility;
2. BellSouth determined the unavailable space (i.e., restrooms, hallways, stairs, etc.);
3. BellSouth determined assigned space currently occupied by the BellSouth switch, transmission, power and other equipment, as well as necessary administrative space;
4. BellSouth determined the space reserved for future defined uses necessary to adequately serve BellSouth customers, including consideration given to BellSouth's future switch growth plans;
5. BellSouth identified any unusable space (such as basements subject to flooding); and

8. BellSouth determined available collocation space by subtracting Items 2-5 from item 1.

6. As previously stated, BellSouth's thorough assessment of the facility confirmed that there is no space available for physical collocation. The facility currently has 14,572 square feet on each of two floors for a total of 29,144 square feet. A total of 27,017.5 square feet is occupied as follows:

<u>Square Feet</u> <u>First Floor:</u>	<u>Description</u>
393	Stairwell
412	Air Handling Unit Room
261	House Service Panel
929	Stairwell, Lobby, Restroom, House Service Room and Air Handling Unit Room
886	Administrative
3,666	Toll/Transmission Equipment
2200.5	Switch
1,234	Power and Engine Room
2,464	Frame
<u>Square Feet</u> <u>Second Floor:</u>	<u>Description</u>
286	Stairwell, Electrical and Telephone Rooms
637	Restrooms and Janitor Room
260	Stairwell
443	Air Handling Unit Room
12,946	Administrative

7. The remaining 2126.5 square feet in the facility is reserved for defined future use essential for BellSouth to meet the growing needs of its customers through the year 2000. The projects include incremental additions to the existing switching system, power and transmission equipment. These projects will use the remaining space in the facility. As previously stated, BellSouth has provided the Commission with a detailed floor plan indicating the space constraints under which BellSouth is currently operating at the Boca Raton Boca Teeca CO, as well as the areas designated for defined future use. (Exhibit 1).

8. The Boca Raton Boca Teeca CO presently contains no available space for physical collocation and for this reason should be excluded from the collocation requirements. BellSouth will, of course, offer virtual collocation in the Boca Raton Boca Teeca CO.

WHEREFORE, having demonstrated good cause for its request, BellSouth asks that the Commission grant its Petition for Waiver and exempt BellSouth from the obligation to offer physical collocation in the Boca Raton Boca Teeca CO.

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PAGE 24

Respectfully submitted this 27th day of July, 1998.

BELLSOUTH TELECOMMUNICATIONS, INC.



ROBERT G. BEATTY

NANCY B. WHITE

c/o Nancy Sims

150 South Monroe Street, #400

Tallahassee, Florida 32301

(305) 347-5555



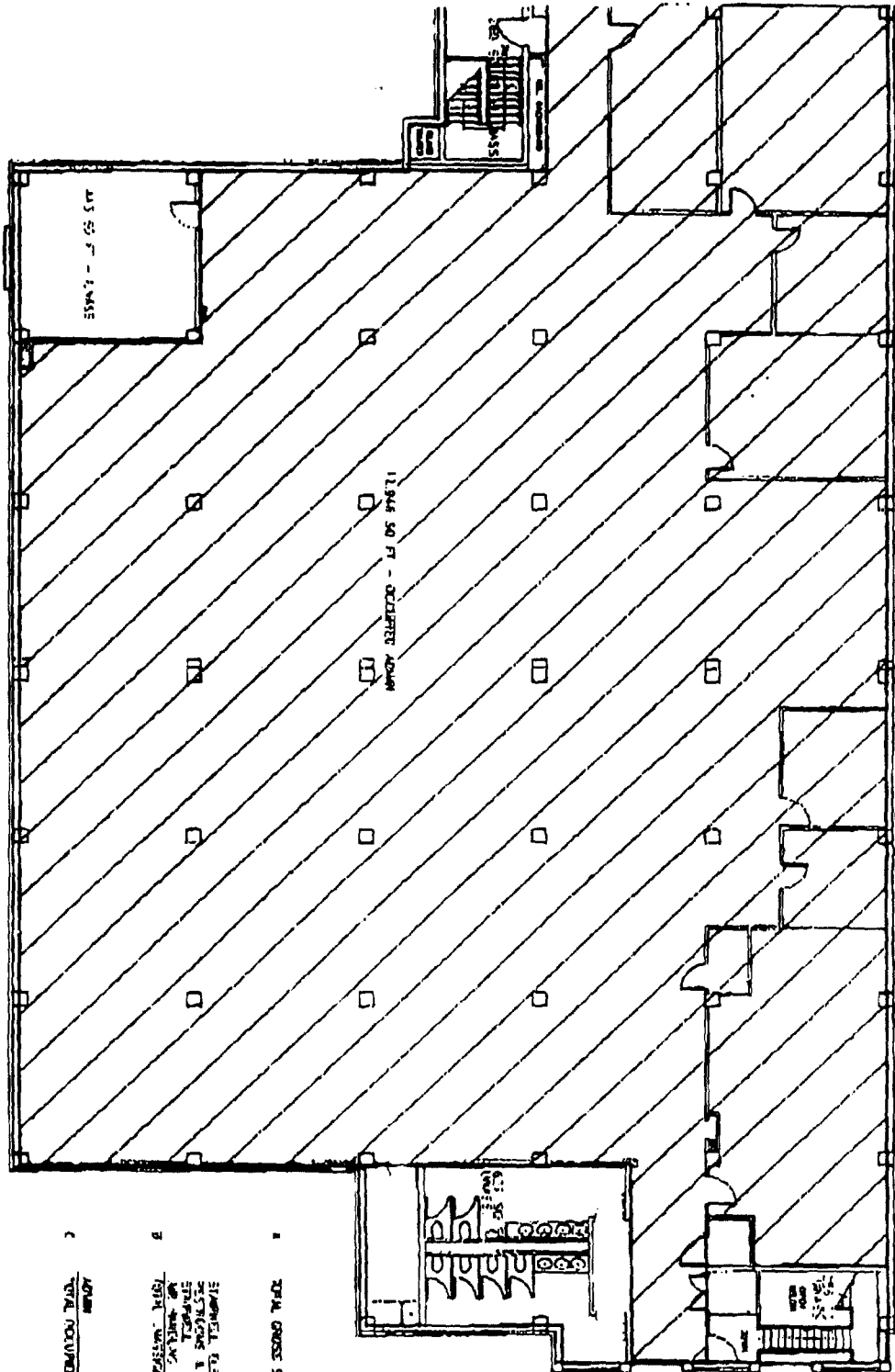
WILLIAM J. ELLENBERG II

675 West Peachtree Street, #4300

Atlanta, Georgia 30375

(404) 335-0711

E8181 BOCA RATON - BOCA TEECA SECOND FLOOR PLAN



A	TOTAL GROSS SQ FT	14,372
B	STAIRWELL, ELEVATOR & ELEVATOR SHAFTS	284
	STAIRWELL	470
	ELEVATOR	200
	ELEVATOR SHAFTS	117
C	TOTAL OCCUPIED SPACE	12,946



